

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----	x	
	:	
JESSICA EARNshaw,	:	
	:	
Plaintiff,	:	15-CV-169 (SJ) (RML)
	:	
v.	:	<u>STIPULATION OF</u>
	:	<u>DISMISSAL AND</u>
ALEXZANDRA JOHNSON,	:	<u>[PROPOSED] ORDER</u>
	:	
Defendant.	:	
	:	
-----	x	

WHEREAS, Plaintiff filed the complaint in the above-captioned matter on January 13, 2015 (the “Complaint”);

WHEREAS, the parties stipulated and agreed to extend Defendant’s time to answer, move or otherwise respond to the Complaint through and including April 24, 2015, which the Court approved in its orders dated February 10, 2015 (Dkt. No. 8) and March 17, 2015 (Dkt. No. 10);

WHEREAS, the parties have subsequently reached an agreement in principle to settle this matter, and wish to avoid unnecessary burdens on the Court while the settlement is consummated;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, subject to approval by this Court, that:

1. Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, the above-captioned action is hereby dismissed, without prejudice to reopen upon application of either

party within 30 days of the date of this Order if settlement is not consummated, in which event the action will be restored.

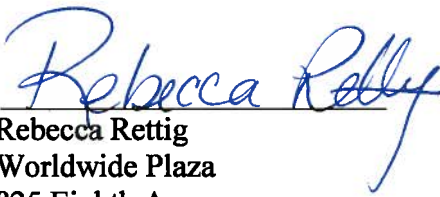
2. If additional time is required for the settlement to be consummated, the parties may apply to the Court to request an extension of such 30-day period.

3. If such 30-day period and any extensions thereof granted by the Court expire without an application by either party to reopen, the Court shall order the above-captioned action dismissed with prejudice, without costs or attorneys' fees to either party.

4. This Stipulation may be signed in counterparts, and facsimile/PDF signatures shall be deemed originals for the purpose of this Stipulation.

Dated: April 13, 2015
New York, New York

CRAVATH SWAINE & MOORE LLP

By: 
Rebecca Rettig
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000
Attorneys for Plaintiff

Alexzandra Johnson
Pro se Defendant


SO ORDERED:

The Honorable Sterling Johnson, Jr.
United States District Judge

Dated: April 23, 2015
New York, New York

CRAVATH SWAINE & MOORE LLP

By: _____
Rebecca Rettig
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000
Attorneys for Plaintiff



Alexandra Johnson
Pro se Defendant

SO ORDERED:

The Honorable Sterling Johnson, Jr.
United States District Judge